

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

|               |   |                       |
|---------------|---|-----------------------|
| IN RE:        | } |                       |
|               | } | Case No. 20-30815-KLP |
| Kevin B. Dent |   |                       |
|               | } |                       |
|               | } | Chapter 13            |
|               | } |                       |
|               | } |                       |
| <b>Debtor</b> |   |                       |
| Address       |   | 7020 Bolelyn Way      |
|               |   | Henrico, Va. 23231    |
| SSN:          |   | xxx-xx-0886           |

**NOTICE OF MOTION AND NOTICE OF HEARING**

Kevin B. Dent, ("Debtor"), by counsel, has filed a Motion For Authority to Sell A Vehicle, Motion to Expedite, and Motion to Shorten Notice Period.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.**

If you do not want the court the grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before you or your attorney must:

- ✓ File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

**Clerk of Court  
United States Bankruptcy Court  
701 E. Broad Street, Room 4000  
Richmond, VA 23219**

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
}

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| Kevin B. Dent | } | Case No. 20-30815-KLP |
| Debtor        | } |                       |
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You must also mail a copy to:

Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125

- ✓ **Attend a hearing scheduled for March 23<sup>rd</sup>, 2022 at 10:00 A.M.. at Judge Huennkens at 701 E. Broad Street, Room 5000, Richmond, VA 23219.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

/s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)  
(804) 644-4874 (F)

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Local Rule 9022-1, on March 11, 2022, the foregoing **Notice of Motion** has been served on and/or endorsed by all necessary parties.

March 11, 2022

RESPECTFULLY SUBMITTED

Kevin B. Dent

By: /s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)  
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Kevin B. Dent  
Debtor

} Case No. 20-30815-KLP  
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} Chapter 13

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Kevin B. Dent

Case Number 20-30815-KLP  
Chapter 13

Debtor

**MOTION TO EXPEDITE HEARING**

COMES NOW, Kevin B. Dent, the Debtor, by Counsel, and offer the following in support of his **Motion to Expedite Hearing** on the **Motion for Authority to Sell A Vehicle**:

1. On February 17, 2020 , Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § §1301 **et seq.**
2. Debtor seeks to Sell a 2007 Toyota Tundra which is in the Chapter 13 Plan.
3. That an expedited hearing on the Motion *hearing is* necessary for the following reason:
4. **That the Debtor has a buyer willing to purchase the vehicle and time is of the essence.**
5. An expedited hearing is necessary under the circumstances and creditors and parties in interest will not be prejudiced by such expedited hearing being granted, in fact it is their best interest.

WHEREFORE, the Debtor respectfully request this Honorable Court to schedule a hearing to be heard on an expedited basis to consider the **Motion for Authority to Sell A Vehicle** and for such other and further relief as the Court deems proper.

March 11, 2022

RESPECTFULLY SUBMITTED,  
Kevin B. Dent

By: /s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)

Massie Law Firm, PC  
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Kevin B. Dent  
Debtor

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(804) 644-4874 (F)

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Kevin B. Dent  
  
Debtor

Case Number 20-30815-KLP  
Chapter 13

**CERTIFICATION REGARDING REQUEST FOR EXPEDITED HEARING**

In support of the attached request for an expedited hearing as required by Local Rule 9013-1(N), I hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing.
2. I have not created the emergency through any lack of due diligence, and
3. I have made a *bona fide* effort to resolve the matter without hearing.

March 11, 2022

RESPECTFULLY SUBMITTED,  
Kevin B. Dent

By: /s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)  
(804) 644-4874 (F)

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Local Rule 9022-1, on March 11, 2022, the foregoing **Motion to Expedite Hearing** has been served on and/or endorsed by all necessary parties.

March 11, 2022

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
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Kevin B. Dent  
Debtor

} Case No. 20-30815-KLP  
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RESPECTFULLY SUBMITTED

Kevin B. Dent

By /s/: Joseph Massie, III

Joseph Massie, III

115 N. 1<sup>st</sup> Street

Richmond, VA 23219-2125

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Kevin B. Dent  
Debtor

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Chapter 13

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Kevin B. Dent

Case Number 20-30815-KLP  
Chapter 13

Debtor

**MOTION TO SHORTEN NOTICE PERIOD**

COMES NOW, Kevin B. Dent, ("the Debtor"), by Counsel, and file this Motion to Shorten the Notice Period for the Motion for Authority to Sell a Vehicle pursuant to 11 USC §364(a) and 1304, Federal Rules of Bankruptcy Procedure 4001(c) and 9013, and Local Bankruptcy Rules 9013-1. In support thereof, Debtor respectfully states the following:

**Jurisdiction**

1. This court has exclusive jurisdiction over this matter pursuant to 28 USC §1334.
2. This proceeding is a core proceeding under 28 USC §157(b)(2)(A)(B)(K) and (O).
3. Venue is proper pursuant to 28 USC §1409.

**Facts**

4. On February 17<sup>th</sup>, 2020, the Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § 1301 et seq.
5. Debtor seeks to shorten the notice period for the **Motion to Authorize the Sell of a Vehicle** from twenty-one (21) days to twelve (12) days.

WHEREFORE, the Debtor prays that this Court enter an Order shortening the notice period for the **Motion for Authority to Sell A Vehicle**.

March 11, 2022

RESPECTFULLY SUBMITTED,

Kevin B. Dent

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
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Kevin B. Dent  
Debtor

} Case No. 20-30815-KLP  
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By: /s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)  
(804) 644-4874 (F)

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Local Rule 9022-1, on March 11, 2022, the foregoing **Motion to Shorten Notice Period** has been served on and/or endorsed by all necessary parties.

March 3, 2022

RESPECTFULLY SUBMITTED  
Kevin A. Dent

By /s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)  
(804) 644-4874 (F)

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
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} Case No. 20-30815-KLP

Kevin B. Dent  
Debtor

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**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Kevin B. Dent

Case Number 20-30815-KLP  
Chapter 13

Debtor

**MOTION FOR AUTHORITY TO SELL A VEHICLE**

COME NOW, the Debtor, Kevin B. Dent, by counsel, and in support of her request Motion for Authority to Incur Indebtedness, states as follows:

1. The Court has exclusive jurisdiction over the property in question under 28 USC Section 1334. This is a core matter.
  2. On February 17<sup>th</sup>, 2020, the Debtor filed a voluntary Chapter 13, bankruptcy.
  3. The Debtor is financing a 2007 Toyota Tundra which is a part of Chapter 13 Plan.
  4. That on or about February 21, 2022, the Debtor received a contract offer for the purchase of the vehicle from Car Max for \$ 5,500.00
  5. That the Debtor owes \$ 5915.56 according to the Chapter 13 Trustee.
  6. That the Debtor believes this is a very fair market price for the property, and that this is the best sale price he could reasonably achieve.
  7. That the pay off for the vehicle is \$ 5915.56 according to the Chapter 13 Trustee.
  8. That the Debtor is willing and capable of paying the difference.
  9. That the Debtor no longer wants the responsibility of the vehicle.
- Debtor request that the fourteen (14) day stay provided for pursuant to Federal Rules of Bankruptcy Procedure 6004(H) in the instant matter be waived.

WHEREFORE, the Debtor requests an Order authorizing them to incur said indebtedness and for such other relief as the Court may deem appropriate.

March 11, 2022

RESPECTFULLY SUBMITTED,  
Kevin B. Dent

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
}

Kevin B. Dent  
Debtor

} Case No. 20-30815-KLP  
}  
}  
} Chapter 13



By: /s/: Joseph Massie, III  
Joseph Massie, III  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219-2125  
(804) 644-4878 (T)  
(804) 644-4874 (F)

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Local Rule 9022-1, on March 11, 2022, the foregoing **Motion for Authority to Sell A Vehicle** has been served on and/or endorsed by all Necessary Parties.

Kevin B. Dent  
7020 Bolelyn Way  
Henrico, Va. 23231

Carl Bates  
PO Box 1819  
Richmond, VA 23219

U.S. Trustee  
Judy A. Robbins  
Office of the U.S. Trustee  
701 E. Broad Street, Ste 4303  
Richmond, Va. 23219

Aes/pheaaelt  
Attn: Bankruptcy  
Po Box 2461  
Harrisburg, PA 17105

Capital One

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
(804) 644-4878 (T)  
(804) 644-4874 (F)  
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Kevin B. Dent  
Debtor

}  
}  
}  
} Chapter 13

Attn: Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130

Carl Bates  
PO Box 1819  
Richmond, VA 23219

Carrington Mortgage Services  
Attn: Bankruptcy  
Po Box 3730  
Anaheim, CA 92806

Cashnet USA  
Attn: Statement Manager  
175 W Jackson Blvd, Ste 1000  
Chicago, IL 60604

Citibank North America  
Attn: Recovery/Centralized Bankruptcy  
Po Box 790034  
St Louis, MO 63179

Citibank/Shell Oil  
Citicorp Credit Svcs/Centralized Bk dept  
Po Box 790034  
St Louis, MO 63179

Citibank/The Home Depot  
Citicorp Credit Svcs/Centralized Bk dept  
Po Box 790034  
St Louis, MO 63179

IRS

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
115 N. 1<sup>st</sup> Street  
Richmond, VA 23219  
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Kevin B. Dent  
Debtor

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} Chapter 13

P.O. Box 7346  
Philadelphia, PA 19101-7346

Lendmark Financial  
Attn: Bankruptcy  
1735 N Brown Rd, Ste 300  
Lawrenceville, GA 30043

OneMain Financial  
Attn: Bankruptcy  
Po Box 3251  
Evansville, IN 47731

Santander Consumer USA  
P.O. Box 961245  
Fort Worth, TX 76161

Snap Finance  
P.o. Box 26561  
Salt Lake City, UT 84126

Wells Fargo Dealer Services  
Attn: Bankruptcy  
Po Box 19657  
Irvine, CA 92623

Massie Law Firm, PC  
Joseph Massie, III, Esquire (Bar No. 35472)  
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